




FRAUD PREVENTION POLICY

The Costain Group is committed to the pursuance of high legal, ethical and moral standards and expects all its employees as well as suppliers, partners and customers to share this commitment. The business is defined by key values which are promoted within the policy on Ethical Business Conduct. The Costain Group is also committed to the mitigation of the risk of fraudulent activity anywhere within the organisation.

Costain will ensure that this will be effective by:

- Promoting a zero tolerance approach to fraud in Costain.
- Investigating fully all reports or suspicions of dishonest behaviour, ensuring that perpetrators are subject to full disciplinary procedures as well as civil and/or criminal action taken where appropriate.
- Encouraging staff and third parties to report reasonably held suspicions of fraud, confidentially, guaranteeing them that no employee, making such a report in good faith, will suffer as a result of doing so.
- Providing the facility of a confidential helpline which can be used by staff and external people to raise issues of concern. Reports via this medium will be investigated and reported to the Audit Committee.
- Promoting awareness of fraud risks and requiring management to implement a sound and effective system of both preventative and detective controls to minimise the risk of fraud.
- Investing in the training of managers and employees so they are aware of the risks faced by the business.
- Implementing a fraud response plan across the business which must be followed by all employees, supply chain and other partners.

This policy (and all associated policies and procedures) will be reviewed annually to ensure continuing suitability, adequacy and effectiveness of preventing fraud within Costain.

Signed: 

A. Wyllie (Chief Executive Officer)

Date: 6th Feb 2015